

***IN THE DISTRICT COURT OF THE UNITED STATES
For the Western District of New York***

**OCTOBER 2018 GRAND JURY
(Impaneled 10/24/2018)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

Violations:

**ELIZABETH HARRISON
a/k/a Dynamite a/k/a D a/k/a Liz**

Title 18, United States Code,
Sections 2261A(2) and 1001(a)(2)
(2 Counts)

**COUNT 1
(Cyberstalking)**

The Grand Jury Charges That:

From in or about October 2018 until on or about November 2, 2018, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **ELIZABETH HARRISON a/k/a Dynamite a/k/a D a/k/a Liz**, with the intent to injure, harass, and intimidate another person, that is, Victim 1, a person known to the Grand Jury, knowingly used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, a cellular telephone and the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

COUNT 2
(False Statements)

The Grand Jury Further Charges That:

On or about November 2, 2018, in the Western District of New York, the defendant, **ELIZABETH HARRISON a/k/a Dynamite a/k/a D a/k/a Liz**, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, that is, the defendant did state to a Deputy of the United States Marshals Service that her name was “Deborah,” and that Elizabeth Harrison a/k/a “Liz” was not at 40 Northland Avenue, Buffalo, New York, when, in truth and in fact, and as the defendant then and there knew, her name was not “Deborah,” and she in fact was Elizabeth Harrison and was in fact present at 40 Northland Avenue, Buffalo, New York at the time she made the statements and representations.

All in violation of Title 18, United States Code, Section 1001(a)(2).

DATED: Rochester, New York, December 20, 2018.

JAMES P. KENNEDY, JR.
United States Attorney

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A TRUE BILL:

s/FOREPERSON
FOREPERSON